

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 1:24-cv-21463-RKA

NEREYDA SUHEY CASTILLO MARENCO,

Plaintiff,

vs.

J.C. PAINTING CONTRACTOR LLC,
MARIA GONZALEZ, and
TOMAS GONZALEZ SOTELO,

Defendant.

DEFENDANTS' OFFER OF JUDGMENT
26 U.S.C. §7434 CLAIM (COUNT II)

Defendants, by and through the undersigned counsel, Todd W. Shulby, P.A., pursuant to Rule 68, Fed.R.Civ.P., hereby submit this Offer of Judgment to Plaintiff as to Plaintiff's 26 U.S.C. §7434 Claim (Court II), if accepted in accordance with Rule 68, Fed.R.Civ.P., authorizes the Court to enter judgment in favor of Plaintiff, and against Defendants, on the following terms:

- a. This Offer of Judgment is made on behalf of Defendants to Plaintiff.
- b. This Offer of Judgment is intended to resolve all claims raised by Plaintiff under 26 U.S.C. §7434 (Count II), in the above-styled action by Plaintiff against Defendants, including all costs and attorneys' fees accrued in relation to the claim, to the extent recoverable and applicable to the 26 U.S.C. §7434 cause of action asserted.
- c. The relevant conditions to this Offer of Judgment are that Defendants pay to Plaintiff:
1) one payment in the amount of \$5,000.00 to Plaintiff; and 2) one payment to Plaintiff/ Plaintiff's counsel as reasonable attorney's fees and costs to the extent allowable under 26 U.S.C. §7434, in an amount negotiated by the Parties and/or determined by the Court through the date of this Offer of

Judgment. Plaintiff may file a motion with the Court for such attorney's fees and costs in accordance with the applicable rules of procedure.

d. This settlement amount(s) set forth above will be paid within a reasonable time of the Plaintiff's acceptance of this Offer of Judgment and the entry of a final order on this Offer of Judgment.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 11, 2024, a true and correct copy of the foregoing has been served by e-mail and U.S. Mail to:

Brian H. Pollock, Esq.
E-mail: brian@fairlawattorney.com

Patrick Brooks LaRou, Esq.
E-mail: brooks@fairlawattorney.com

Respectfully submitted,

/s/Todd W. Shulby, Esq.
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